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June 27, 2024

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

**RE:** *Crystallex International Corporation v. Bolivarian Republic of Venezuela,*  
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

Pursuant to the Court's June 4, 2024, *Oral Order* [D.I. 1186] scheduling a Status Conference and directing the Special Master,<sup>1</sup> to confer with the Sale Process Parties and use reasonable efforts also to confer with other interested entities, I write to submit this proposed agenda (this "**Proposed Agenda**") on behalf of the Special Master. Consistent with the Court's instructions, the Special Master conferred with the Sale Process Parties, and solicited input from other interested entities, regarding the contents of the Proposed Agenda attached hereto in Exhibit A.

Respectfully,

/s/ Myron T. Steele

Myron T. Steele (#00002)  
*Counsel for Special Master*  
*Robert B. Pincus*

cc: Counsel of Record (via CM/ECF)  
Enclosure

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master's Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* [D.I. 481] (the "**Sale Procedures Order**").